

# **Attachment 1**

1. May 14, 2015, 11-page memorandum providing the legal basis for approval of job-placement rate (“JPR”) misrepresentation claims for attendees of specified programs offered at Heald College campuses (Dkt. 90-1 [Tab B & Entry No. 1]);
2. May 14, 2015, 4-page memorandum providing the legal basis for approval of JPR misrepresentation claims for attendees of specified programs offered at Heald College campuses (Dkt. 90-1 [Tab B & Entry No. 2]);
3. October 20, 2016 memorandum providing the legal basis for approval of transferability-of-credits misrepresentation claims for California Heald College campuses (Dkt. 90-1 [Tab C & Entry No. 3]);
4. October 24, 2016 memorandum providing the legal basis for approval of transferability-of-credits misrepresentation claims for Everest schools and WyoTech’s Laramie campus (Dkt. 90-1 [Tab D & Entry No. 4]);
5. January 4, 2017 memorandum providing findings and the legal basis for approval of full borrower-defense relief to certain borrowers that attended American Career Institute’s Massachusetts campuses (Dkt. 90-1 [Tab G & Entry No. 7]);
6. January 9, 2017 memorandum providing the legal basis for approval of guaranteed-employment misrepresentation claims for all Corinthian schools (Dkt. 90-1 [Tab E & Entry No. 5]);
7. January 10, 2017 memorandum providing the legal basis for approval of guaranteed-employment misrepresentation claims for ITT Technical campuses in California (Dkt. 90-1 [Tab F & Entry No. 6]);
8. January 12, 2017 memorandum regarding statute-of-limitations analysis under California law for Corinthian and ITT borrower-defense claims;
9. January 19, 2017 memorandum concluding for transferability-of-credit claims for Heald, Everest, and WyoTech that the state law which gave rise to the legal claim against the seller must also be the basis for determining relief;
10. February 2017 BDU Claims Review Protocol (Dkt. 90-1 [Tab H & Entry No. 8]);
11. May 4, 2017 memorandum regarding action items for Borrower Defense, in which Secretary DeVos adopts the Acting Undersecretary’s recommendation “with extreme displeasure” (Dkt. 96-1 No. 2));
12. December 2017 memorandum regarding “Borrower Defense Relief Methodology for CCI Claims;” and
13. December 14, 2017 memorandum from Steven Menashi regarding “Legal bases for approval and discharge of pending borrower defense claims for former Corinthian students qualifying for approval on the grounds of Job Placement Rate, Guaranteed Jobs, and Transfer of Credit findings.” (Dkt. 96-1 Nos. 105, 106).